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January 28, 2023

Goodman v. Bouzy, et. al. Case No. 1: 21-cv-10878-AT-JLC


Honorable Analisa Torres
District Judge
U.S. District Court for the
Southern District of New York
500 Pearl Street
New York, N.Y. 10007
Via ECF filing and PDF e-mail

SUBJ: Pre-motion permission to file a F.R.C.P. Rule 12(d) and 12(6)(a)(1) Motion to Dismiss

Your Honor,

1. By the leave of the Court, and pursuant to your Individual Rule of Practice, the undersigned wishes to file a Motion to Dismiss ECF no. 100, the “Amended Complaint”.
2. The Court should dismiss plaintiff Jason Goodman’s “Amended Complaint” (ECF No. 100) against David George Sweigert because it is barred by the doctrine of res judicata, fails to state a RICO claim upon which relief should be granted, and is barred by federal law. It also seeks to hold the other Defendants liable for acts that did not cause Goodman any harm, depriving Goodman of standing and this Court of subject matter jurisdiction. Because of these multiple pleading failures, the Court should dismiss the Amended Complaint with prejudice.
3. Respectfully.

Signed this 28th day of January 2023.



D.G. SWEIGERT, DEFENDANT

CERIFICATE OF SERVICE

Hereby certified that a PDF copy of this letter has been sent via electronic mail to:

Jason Goodman, sole stockholder of MULTIMEDIA SYSTEM DESIGN, INC.

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Certified under penalties of perjury.

Signed this 28th day of January 2023.



PRO SE